

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: DOROTHY M KELLY

) Case No. 17 B 13930  
)  
Debtor ) Chapter 13  
)  
) Judge: CAROL A DOYLE

**NOTICE OF MOTION**

DOROTHY M KELLY

DAVID M SIEGEL  
via Clerk's ECF noticing procedures

4912 W FULTON 2FL  
CHICAGO, IL 60644

Please take notice that on February 11, 2020 at 9:15 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on January 08, 2020.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On May 03, 2017 the Debtor filed a petition under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on September 19, 2017.

A summary of the debtor's plan follows:

Monthly Payment \$100.00

Last Payment Received: 06/25/2019

Amount Paid \$2,923.40

Amount Delinquent \$276.60

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to the term of a confirmed plan, pursuant to § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn